

REMARKS/ARGUMENTS

I. Information Disclosure Statement

Applicant has re-submitted references cited in the specification in an Information Disclosure Statement on a separate paper for consideration by the Examiner, in compliance with MPEP section 609.04(a).

II. REJECTION OF CLAIMS 1 - 4 and 6 – 12 under 35 U.S.C. 102

The Examiner has rejected claims 1-4 and 6-12 under 35 U.S.C. § 102(e) as being anticipated by Verghese (US Patent 7,038,709). In response, the Applicants have amended independent claim 1, from which claims 2-3 depend; claim 4, from which 6-10 depend, and claim 11, from which claim 12 depends in order to more clearly recite aspects of the invention. Applicants respectfully submit that the amended claims are supported by the specification as filed and that no new matter has been introduced.

Verghese only teaches moving an image capture device in two degrees of freedom (pitch, Fig. 5, 504 and yaw, Fig. 5, 508 in the present invention). Moreover, the object of Verghese is to center a 2-dimensional representation of an object (i.e. a person's face) in the center of the field of view of an image capture device. Verghese's image tracking system is not capable of repositioning the image capture device using 6 degrees of freedom for two reasons: First, Verghese's repositioning hardware is incapable of linear movements (movements in X, Fig. 5, 508; Y, Fig. 5, 506 or Z, Fig. 5, 510) or of correcting errors in roll (Fig. 5, 512). Second, Verghese's image processing function determines a single centroid point in each image for use in repositioning the image capture device. A single point in multiple images is not sufficient to reposition an image capture device relative to six degrees of freedom.

Applicant opines that independent claims 1, 4 and 11 as amended, and claims 2-3, 6-10 and 12 as respectively dependent therefrom, now fully satisfy the requirements of 35 U.S.C. § 102(e) and are patentable thereunder.

III. REJECTION OF CLAIM 5 under 35 U.S.C. 103

The Examiner has rejected claim 5 as unpatentable under 35 U.S.C. § 103 over Verghese in light of Palm (US Patent 5,699,444). For the reasons set forth hereinabove, Verghese does not anticipate Applicant's invention. Nor does Palm, in combination with Verghese, teach the Applicant's invention. Specifically, Palm merely teaches a simplified method that can be used to extract a model of a 3-dimensional object from multiple camera views of an object using only three points whose relative positions are known precisely. The current invention requires the generation of a model of a 3-dimensional object (Step 206 in Fig. 3), however, that model can be extracted by directly measuring the object and does not require use of the multi-image technique taught by Palm. Furthermore, Palm teaches techniques for extracting photogrametric information from multiple images whereas the applicant teaches techniques for duplication of a reference image by moving an image capture device from one point in space to another utilizing 6 degrees of freedom.

Applicant has amended independent claim 4 from which claim 5 depends. Applicant respectfully submits that claim 5, in light of the amendment of independent claim 4, now fully satisfies the requirements of 35 U.S.C. § 103 and is patentable thereunder.

IV. CONCLUSIONS

In view of the foregoing, it is respectfully urged that all of the present claims of the application are patentable and in a condition for allowance. Notice of allowance is earnestly solicited. The undersigned applicant can be reached at 650-960-3362 to facilitate prosecution of this application, if necessary.

Respectfully submitted,

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